

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:**

**WAKASA LLC**

**Debtor**

§  
§  
§  
§  
§


**CASE NO. 22-33323**

**CHAPTER 11**

**MOTION FOR ENTRY OF FINAL DECREE AND CLOSING OF CASE**

**THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.**

**A HEARING ON THIS APPLICATION WILL BE HELD ON MAY 30, 2023, AT 1:30 PM AT THE UNITED STATES FEDERAL COURTHOUSE, 515 RUSK STREET, COURTROOM 402, HOUSTON, TEXAS 77002.**

**DIAL-IN TELEPHONE NUMBER: 1-832-917-1510**  **CONFERENCE CODE: 999276**  
[GoTo - Judge Rodriguez \(gotomeet.me\)](#)

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.**

**TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:**

COME NOW Wakasa LLC (“Debtor”) and respectfully requests the Court to enter a final decree and close case this Chapter 11 case pursuant to Section 350 of Title 11 of the United States Code, 11 U.S.C. §§ 101 (“Bankruptcy Code”), and Rule 3022 of the Federal Rules of Bankruptcy Procedure, and in support thereof would respectfully show as follows:

**JURISDICTION**

1. This Court has jurisdiction over this matter under 28 U.S.C. § 157(a) and 28 U.S.C. § 1334. This motion is a core proceeding under 28 U.S.C. § 157(b)(2)(A).

### **BRIEF BACKGROUND**

2. On November 4, 2022 ("Petition Date"), the Debtor filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101-1532 ("Bankruptcy Code").
3. On March 28, 2023, this Court entered an Order Confirming Debtor's Consensual Plan (Docket No. 104) directing the execution, implementation, and consummation of the Plan.
4. Debtor filed the Chapter 11 Notice of Consummation of the Plan on May 1, 2023 (Docket No. 113).
5. All post-confirmation matters have been concluded, the Debtor has distributed per the terms of the plan, and the Plan has been consummated as defined by 11 U.S.C. § 1101(2).
6. To Debtor's knowledge, the Debtor has in all respects complied with the Confirmation Order.

### **REQUEST FOR RELIEF**

WHEREFORE, premises considered, Wakasa LLC respectfully requests that this Court close this Chapter 11 case and grant such other and further relief as the Debtor may show itself justly entitled.

Respectfully submitted,

THE LANE LAW FIRM, PLLC  
/s/Robert C. Lane  
Robert C. Lane  
State Bar No. 24046263  
notifications@lanelaw.com  
Joshua Gordon  
State Bar No. 24091592  
Joshua.gordon@lanelaw.com  
6200 Savoy, Suite 1150  
Houston, Texas 77036  
(713) 595-8200 Voice  
(713) 595-8201 Facsimile  
COUNSEL FOR DEBTOR

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Motion for Final Decree was served to the parties listed below and to the parties on the attached mailing matrix either via electronic notice by the court's ECF noticing system, or by first-class mail pre-paid postage on May 2, 2023:

Debtor:

Wakasa LLC  
14511 Old Katy Rd., Suite 320  
Houston, TX 77079

US Trustee:

Office of The United States Trustee  
515 Rusk Street, Suite 3516  
Houston, TX 77002

Notice will be electronically mailed to:

Jeannie Lee Andresen on behalf of Creditor Harris County  
houston\_bankruptcy@lgbs.com, chymel@dorelaw.com

George Ravelo Diaz-Arrastia on behalf of Creditor Real Turf USA LLC  
gdarrastia@sdblawn.com,  
kgates@sdblawn.com;sak@elliottgreenleaf.com;rxza@elliottgreenleaf.com;MCG@elliottgreenleaf.com

Christopher Dylla on behalf of Creditor Texas Comptroller of Public Accounts, Revenue Accounting Division  
bk-cdylla@oag.texas.gov, Sherri.Simpson@oag.texas.gov

Drew McManigle  
drew@MaccoRestructuringGroup.com, kathy@macco.group;TX86@ecfbis.com

Stephen Douglas Statham on behalf of U.S. Trustee US Trustee  
stephen.statham@usdoj.gov

Christopher Ross Travis on behalf of U.S. Trustee US Trustee  
C.Ross.Travis@usdoj.gov

US Trustee  
USTPRegion07.HU.ECF@USDOJ.GOV

Melissa E Valdez on behalf of Creditor Alief Independent School District  
mvaldez@pbfc.com, osonik@pbfc.com,mvaldez@ecf.courtdrive.com

/s/Robert C. Lane  
Robert C. Lane

Label Matrix for local noticing 0541-4 Case 22-33323 Southern District of Texas Houston Tue May 2 13:27:45 CDT 2023	Harris County Linebarger Goggan Blair & Sampson LLP C/O Jeannie Lee Andresen P.O. Box 3064 Houston, Tx 77253-3064	Texas Comptroller of Public Accounts c/o Office of the Attorney General Bankruptcy - Collections Division MC-008 PO Box 12548 Austin, tx 78711-2548
Texas Comptroller of Public Accounts, Revenue Christopher J. Dylla c/o Sherri K. Simpson, Paralegal P.O. Box 12548 Austin, TX 78711-2548	Wakasa LLC 14511 Old Katy Rd Suite 320 Houston, TX 77079-1077	4 United States Bankruptcy Court PO Box 61010 Houston, TX 77208-1010
Alief Independent School District P.O. Box 368 Alief, TX 77411-0368	Cedar Advance 2917 Avenue I Brooklyn, NY 11210-2934	City of Houston 1235 North Loop West, Suite 600 Houston, TX 77008-1772
Comptroller of Public Accounts C/O Office of the Attorney General Bankruptcy - Collections Division MC-008 PO Box 12548 Austin TX 78711-2548	Fundbox 255 2nd Ave. South Minneapolis, MN 55479-0001	Fundbox, Inc. c/o Becket and Lee LLP PO Box 3001 Malvern PA 19355-0701
Harris County, et al c/o Jeannie Lee Andresen Linebarger Goggan Blair & Sampson LLP P.O. Box 3064 Houston, Tx 77253-3064	Internal Revenue Service P.O. Box 7346 Philadelphia, PA 19101-7346	JPMorgan Chase Bank, N.A. s/b/m/t Chase Bank USA, N.A. c/o Robertson, Anschutz, Schneid, Crane & Partners, PLLC 6409 Congress Avenue, Suite 100 Boca Raton, FL 33487-2853
LG Funding 1218 Union St Suite 2 Brooklyn, NY 11225-1512	ProVenture Capital Funding, LLC 99 Wall St. Suite 576 New York, NY 10005-4301	Real Turf USA 10215 S Sam Houston Pkwy W Missouri City, TX 77489-1533
Real Turf USA LLC 10217 S. Sam Houston Pkwy W. Missouri City, TX 77489	SBS Funds 70 East Sunrise Highway Suite 500 Valley Stream, NY 11581-1233	The Lane Law Firm 6200 Savoy Dr Ste 1150 Houston, TX 77036-3369
US Trustee Office of the US Trustee 515 Rusk Ave Ste 3516 Houston, TX 77002-2604	Unique Funding Solutions LLC 71 S. Central Ave Suite 200 Valley Stream, NY 11580-5403	Drew McManigle Chapter 11 Trustee 700 Milam, Suite 1300 Houston, TX 77002-2736
Robert Chamless Lane The Lane Law Firm 6200 Savoy Drive Ste 1150 Houston, TX 77036-3369		

(u)Alief Independent School District

(u)Alief Independent School District and City

(u)Real Turf USA LLC

(u)Cedar Advance, LLC

(u)Insta Capital Group, LLC

(u)Stephen Clark

(d)Wakasa LLC  
14511 Old Katy Rd Suite 320  
Houston, TX 77079-1077

(u)Uschi Clark

End of Label Matrix	
Mailable recipients	24
Bypassed recipients	8
Total	32